

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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August 18, 2022

By ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Application granted. SO ORDERED.

August 18, 2022 /s/ John G. Koeltl
New York, NY John G. Koeltl, U.S.D.J.

Re: United States v. Ivan Espinoza-Gutierrez
22 Cr. 156 (JGK)

Dear Judge Koeltl,

Mr. Espinoza-Gutierrez pled guilty before Your Honor on July 18, 2022 and the Court scheduled an expedited sentencing for September 13, 2022 at 4:30 p.m. The Court further ordered the defense submission to be filed tomorrow, August 19, and the government submission to be filed on August 26.

I write to request that the Court extend the deadline for both submissions by one business day: to August 22 and 29, respectively. I understand from speaking with Probation that it expects to file the final PSR today or tomorrow; the requested adjournment will enable me to review it this weekend before filing my submission. The government by Assistant United States Attorney Maggie Lynaugh consents to this request.

Thank you for your consideration.

Respectfully submitted,

/s/
Sylvie Levine
Assistant Federal Defender
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